



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

**FAXED: JUNE 16, 2005**

June 16, 2005

Ms. Angela Reynolds  
City of Long Beach  
Department of Planning and Building  
333 West Ocean Boulevard, 7<sup>th</sup> Floor  
Long Beach, CA 90802

## **Draft Environmental Impact Report (DEIR) for Home Depot (Long Beach, April 2005)**

Dear Ms. Reynolds:

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The AQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist - CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

*Steve Smith*

Steve Smith, Ph.D.  
Program Supervisor, CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:CB

LAC050504-02  
Control Number

**Draft Environmental Impact Report (DEIR) for Home Depot**

1. **Fugitive Dust Emissions:** Table 4.2.J on page 4.2-28 shows peak grading emissions. Neither the DEIR nor Appendix B shows how the fugitive dust emissions were generated, what emission factors or equations were used, what assumptions were made, and what PM10 emission sources contributed to peak daily fugitive dust emissions. Without this information, the SCAQMD cannot confirm whether the peak daily fugitive dust estimates are accurate. Please provide this information in the footnotes or in the Appendix in the Final EIR. 2
2. **Air Toxics Analysis:** The lead agency states on page 4.2-13 of the DEIR that there are currently no federal project-level requirements for air toxics analysis and that CEQA only requires a consideration of the risks from toxics but provides no guidance or quantitative analysis method. Please note that since the California Air Resources Board (CARB) identified particulate emissions from diesel-fueled engines as a toxic air contaminant in August 1998, the SCAQMD has approved a "Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis." This guidance document was released in March 2003 and is available on the SCAQMD website, as noted in the next comment. 3
3. **Diesel Toxics Analysis:** On page 4.2-25 of the DEIR and page 20 of Appendix B, the lead agency states that, based on comparison with the number of diesel truck trips in similar projects, potential impacts from air toxics impacts associated with the long-term use of diesel delivery trucks associated with the proposed project would be less than significant. There are two problems with this statement. First, no information or data are provided from the referenced project to demonstrate that potential air toxic impacts are similar to the proposed project. The discussion does not even say whether or not air toxic impacts from the referenced projects were concluded to be significant or insignificant. Further, an air toxics analysis is very site specific and depends on a number of factors including local meteorology, distance to the nearest sensitive receptor, and amount of emissions from the project location. Without providing this information and performing the proper analysis, the lead agency has not demonstrated that air toxics impacts associated with the project would be less than significant. Second, the lead agency does not provide any information or analysis on the number of trucks that would be servicing the facility at buildout and contributing to air toxics impacts. For example, review of the URBEMIS output files indicates that the proposed project may generate almost 130 heavy-heavy, and medium heavy-duty truck trips per day. Depending on the distance to the nearest sensitive receptor, the number of diesel truck trips could potentially create significant adverse air toxics impacts. Without providing information on the breakdown or listing of the vehicles by vehicle type that would be servicing the facility at buildout, how many of these vehicles will be heavy-duty diesel trucks, and the distance to the nearest sensitive receptor, the lead agency cannot conclude that potential impacts from air toxics associated with the long-term use of diesel delivery trucks would be less than significant. The SCAQMD recommends that the Final EIR include a mobile source health risk assessment. Mobile source health risk assessment guidance can be found on 4 5

the SCAQMD webpage at

[http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile>toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile>toxic.html).

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4. **Reducing Operational Emissions:** According to Table 4.2.K on page 4.2-29 of the DEIR, operational CO, VOC and NO<sub>x</sub> emissions all exceed the recommended operational significance thresholds. To reduce these emissions, the lead agency has proposed only five mitigation measures that are listed on page 4.2-32 of the DEIR. To further reduce project emissions, SCAQMD staff recommends the following mitigation measures for consideration by the lead agency:

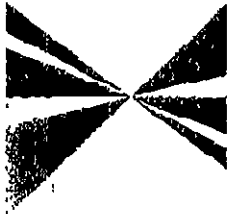
- Require trucks to be offloaded promptly to prevent trucks idling for longer than five minutes.
- Require company-owned trucks use alternative clean fuel such as compressed natural gas, or where diesel trucks have to be used, have trucks use particulate filters, oxidation catalysts, aqueous diesel fuel and low sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content.
- Install equipment to provide power and air conditioning to the trucks to eliminate the need to run the engine or auxiliary power units.
- Require the use of newer, lower-emitting trucks.
- Require trucks to be properly tuned and maintained.
- Reroute truck route to avoid residential areas or schools.
- Use light-colored roofing materials in construction to deflect heat away from buildings.
- Install automatic lighting on/off controls and energy-efficient lighting.
- Landscape with appropriate drought-tolerant species to reduce water consumption.

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5. **CO Hotspots Analysis:** The traffic volumes presented in the CALINE4 output files in Appendix B of the Air Quality Analysis do not appear to match the traffic volumes presented in Tables 13 and 14 of the Traffic Impact Analysis presented in Appendix J of the DEIR. Air quality analyses should be consistent with other analyses (e.g., traffic studies) in the Final EIR.

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SOUTHERN CALIFORNIA



## ASSOCIATION of GOVERNMENTS

**'Main Office**

818 West Seventh Street

• 12th Floor

Los Angeles, California

90017-3495

1 (213) 2 16-1800

1 (213) 276-1825

WWW.SCDOT.CA.GOV

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Imperial County Victim Center, Imperial County -  
to Sheriff's Office

[illegible]

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Verdiana County, Key Moore, Verdiana County •  
 Cap Bortol, Sam Vally • Carl Maltshouse, Sam  
 Bortolhouse and • Jan. 1900. Paul Kautschke

Orange County Transportation Authority: In  
Case 3, County of O.C.A.

Riverside County Transportation Commission  
Building 100, Rte. 16 North

Verde County Transportation Commission  
Katie Sullivan, Treasurer

Feb. 6, 1904

May 25, 2005

Ms. Angela Reynolds  
Environmental Planning Officer  
333 W. Ocean Boulevard, 7<sup>th</sup> Floor  
Long Beach, CA 90802

**RE: SCAG Clearinghouse No. I 20050290 Long Beach Home Depot**

Dear Ms. Reynolds:

Thank you for submitting the **Long Beach Home Depot** for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

We have reviewed the **Long Beach Home Depot**, and have determined that the proposed Project is not regionally significant per SCAG Intergovernmental Review (IGR) Criteria and California Environmental Quality Act (CEQA) Guidelines (Section 15206). Therefore, the proposed Project does not warrant comments at this time. Should there be a change in the scope of the proposed Project, we would appreciate the opportunity to review and comment at that time.

A description of the proposed Project was published in SCAG's **May 1-15, 2005** Intergovernmental Review Clearinghouse Report for public review and comment.

The project title and SCAG Clearinghouse number should be used in all correspondence with SCAG concerning this Project. Correspondence should be sent to the attention of the Clearinghouse Coordinator. If you have any questions, please contact me at (213) 236-1945. Thank you.

Sincerely,

MARK BUTALA  
Senior Regional Planner...  
Intergovernmental Review



"Chapman, Susan"  
<ChapmanS@metro.net>

06/14/2005 10:55 AM

To: "angela\_reynolds@longbeach.gov"  
<angela\_reynolds@longbeach.gov>  
cc: "Hills, Heather" <HillsH@metro.net>, "Kim,  
Douglas" <KimD@metro.net>  
Subject: Comments on Home Depot Project

Ms. Reynolds,  
Attached are Metro's comments on the Draft EIR for the Home Depot Project  
(Project Number CLB430). The hard copy of the letter will be mailed to you  
today.

<<Home Depot - Long Beach.pdf>>  
Thank you-  
Susan Chapman  
Metro Long Range Planning  
213-922-6908



**Metro**

Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
metro.net

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June 14, 2005

Ms. Angela Reynolds  
Environmental Planning Officer  
333 W. Ocean Boulevard, 7<sup>th</sup> Floor  
Long Beach, CA 90802

Dear Ms. Reynolds:

Thank you for the opportunity to comment on the Draft EIR for the Home Depot Project (Project Number CLB430). It appears that the requirements of the Congestion Management Program for traffic analysis have been met. However, some aspects of the transit analysis should be reviewed, specifically:

1. It should be noted that all public transit services within the project area must be analyzed; not those routes identified as part of the 2002 Transit Monitoring Network only.
2. While it is stated that the project would not conflict with adopted programs or policies to encourage alternative transportation, these programs are not described as they relate to the proposed project.
3. The question of whether bus turnouts would be considered as part of the project as identified in the NOP response letter submitted by Orange County Transportation Authority is not addressed in DEIR.

Metro looks forward to reviewing the Final EIR. If you have any questions regarding this response, contact me at 213-922-6908 or by email at chapmans@metro.net. Please send the Draft EIR to the following address:

Metro CEQA Review Coordination  
One Gateway Plaza MS 99-23-2  
Los Angeles, CA 90012-2952  
Attn: Susan Chapman

Sincerely,

Susan Chapman  
Program Manager, Long Range Planning

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